

**UNITED STATES BANKRUPTCY COURT**  
**EASTERN DISTRICT OF PENNSYLVANIA**  
**Philadelphia Division**

Marisa Elizabeth Tennessee,

Debtor.

Case No. 25-10140-AMC  
Chapter 13

**Motion to Extend the Automatic Stay**

Debtor Marisa Elizabeth Tennessee, through their attorney, moves this Court as follows:

1. The Debtor filed a bankruptcy petition on January 13, 2025. They have yet to file a plan and all schedules, statements, and other documents required by 11 U.S.C. §521(a)(1) and Fed. R. Bankr. P. 1007(b), but will do so in a timely fashion.
2. The Debtor was involved in one active bankruptcy between January 14, 2024, and January 13, 2025:

Case No.	District	Filed	Dismissed	Reason
24-10580	PAEB	02/22/2024	08/16/2024	Failure to make plan payments

3. Because the Debtor was involved in only one active bankruptcy between January 14, 2024, and January 13, 2025, the automatic stay is set to expire on February 12, 2025. 11 U.S.C. § 362(c)(3)(A).

4. The Court may extend the automatic stay when a case is filed in good faith as to the creditors to be stayed. Good faith means that there are new circumstances demonstrating that the Debtor can probably reach the end of a chapter 13 plan. *In re Legree*, 285 B.R. 615, 620 (Bankr. E.D. Pa. 2002).

5. This case was filed in good faith. During the prior case, the debtor was dealing with the medical issues causing her to be miss work repeatedly, which caused her income to decrease. She is now healthy, so her income has returned to normal, and she has also moved in with a parent and no longer pays rent, decreasing expenses.

6. Because this case was filed in good faith, the Court must continue the automatic stay against all creditors until the Debtor receive a discharge.

For those reasons, the Court must grant relief in the form of order attached, and further in the Debtor's favor if necessary and proper under the law.

Date: January 13, 2025

CIBIK LAW, P.C.  
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